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IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF CALIFORNIA  
SACRAMENTO DIVISION

**JANE DOE #2,**

Plaintiff,

v.

**MARCUS JOHNSON, et al.,**

Defendants.

2:24-cv-1844 DJC AC P

**STIPULATION TO FURTHER EXTEND  
TIME FOR DEFENDANTS GONZALEZ,  
MACOMBER, AND MONTES TO  
RESPOND TO PLAINTIFF'S FIRST  
AMENDED COMPLAINT; AND**

**~~PROPOSED~~ ORDER**

Judge: Honorable Allison Claire  
Trial Date: None Set  
Action Filed: July 1, 2024

**STIPULATION**

Pursuant to Federal Rule of Civil Procedure 6(b), Plaintiff Doe #2 and Defendants Macomber, Montes, and Gonzalez, by and through their attorneys of record, stipulate as follows:

1. Plaintiff Jane Doe #2 filed her operative First Amended Complaint on November 21, 2024 (ECF No. 20).

2. On December 6, 2024, the Court issued its screening order regarding the First Amended Complaint and ordered Defendants Gonzalez, Macomber, and Montes (Defendants)<sup>1</sup> to

<sup>1</sup> The undersigned counsel does not represent Defendant Johnson. On January 30, 2025, default was entered against Defendant Johnson. (ECF 28.)

1 respond to the First Amended Complaint within 21 days of the filing of the order, making  
2 Defendants' initial deadline December 27, 2024 (ECF No. 21).

3 3. On December 26, 2024, the Court granted the parties' stipulated request to extend the  
4 time for Defendants to respond to the First Amended Complaint until January 24, 2025. (ECF  
5 No. 24.)

6 4. On January 27, 2025, this Court granted the parties' stipulated request to extend the  
7 time for Defendants to respond to the First Amended Complaint until February 28, 2025. (ECF  
8 26.)

9 5. Since that extension, the parties have negotiated the terms of a stipulated protective  
10 order that was submitted on February 24, 2025 (ECF 29). The protective order was executed to  
11 facilitate an early production of documents by Defendants by March 14, 2025, as part of the  
12 parties' efforts to resolve Defendants' arguments for dismissal. Additional time is required to  
13 allow the parties additional time to further meet and confer on the grounds for dismissal,  
14 including the production of documents by Defendants and review of those documents by Plaintiff.  
15 The parties also require additional time to explore early ADR in this matter.

16 6. Additional is time is also needed because Defendants' counsel has been occupied  
17 with other pressing matters, including preparation and filing of a motion to dismiss in the matter  
18 of *Coleman v. CDCR et al.*, No. 2:21-cv-625 and a settlement conference in the matter of  
19 *Campbell v. Ruiz*, No. 2:24-cv-119. In addition, Plaintiff's counsel has been occupied with other  
20 pressing matters, including the filing of a class action case in *California Coalition of Women*  
21 *Prisoners, et al. v. Scott Lee, M.D., et al.*, Case No. 5:25-cv-00283 (SP) (C.D.Cal. 2025) and  
22 meeting and conferring on a dispositive motion in *Matthews v. Pinchback, et al.*, Case No. 2:22-  
23 cv-01329 (DJC)(CSK) (E.D.Cal. 2022). Additionally, Plaintiff's counsel will be away on a pre-  
24 planned vacation from March 27 to April 11, 2025.

25 7. The parties have conferred and agree that additional time to respond to the First  
26 Amended Complaint until April 11, 2025, will allow the parties time to exchange documents,  
27 conduct additional investigation concerning Plaintiff's claims, meet and confer further regarding  
28 Plaintiff's claims, and consider whether early ADR is appropriate for this matter.

8. Accordingly, the parties stipulate and respectfully request that Defendants Gonzalez, Macomber, and Montes shall have up to and including April 11, 2025, to respond to the First Amended Complaint.

**IT IS SO STIPULATED.**

Dated: February 27, 2025

/s/ Jenny Huang  
Jenny C. Huang  
Attorney for Plaintiff, Jane Doe #2

Dated: February 27, 2025

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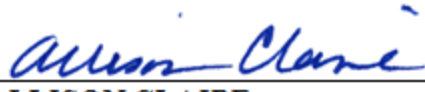
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~~PROPOSED~~ ORDER

Good cause appearing, the parties' stipulation (ECF No. 30) is **GRANTED**. The deadline for Defendants Gonzalez, Macomber, and Montes to respond to Plaintiff's First Amended Complaint is hereby extended up to and including April 11, 2025.

**IT IS SO ORDERED.**

DATED: March 3, 2025

  
ALLISON CLAIRE  
UNITED STATES MAGISTRATE JUDGE